

## CITIZEN PARTICIPATION PLAN

The City of Burlington, through its Community & Economic Development Office (CEDO), strongly encourages public involvement in the Consolidated Plan process, the development of the Assessment Fair Housing (AFH) Plan, and use of Community Development Block Grant money, including Section 108 guarantee loan funds. This Citizen Participation Plan outlines the City's policies and procedures regarding that public involvement.

In the development of the Consolidated Plans, Annual Action Plans, AFH Plan and any substantial amendments to these Plans, the City of Burlington will encourage the participation of local and regional institutions as well as the Chittenden County Homeless Alliance (CoC), nonprofit, philanthropic, community-based and faith based organizations, as well as businesses and developers. In order to respond to the needs of the more than 2,000 Limited English Proficient (LEP) Burlington residents, as well as other stakeholders, and ensure they are able to fully access and participate in the development of these plans, CEDO will assess its language needs and identify any need for translation of notices and other vital documents.

The Citizen Participation Plan, together with the Consolidated Plan, the Annual Action Plans, any substantial amendments to these Plans, and the annual performance reports on the progress of the Consolidated Plan and the AFH, are available at the Community & Economic Development Office, on its website as well as list the other public places it is available.

This Plan, together with all other materials relating to the City's CDBG and HOME programs, are available in alternative formats for persons with disabilities. For information, contact the Community & Economic Development Office at 865-7144.

### Citizen Advisory Board for Entitlement Funds

1. A Citizen Advisory Board will make recommendations each year to the Mayor and City Council on the allocation of CDBG Entitlement funds for projects administered by subgrantees.
2. The Board will include:
  - Elected representatives from each of the City's wards, chosen through the Neighborhood Planning Assemblies;
  - Possible representatives from community partners such as the United Way and the State of Vermont;
  - Up to three appointments by the Mayor; the Mayor will attempt to ensure to the fullest extent possible that the Board represents the existing racial and economic diversity of the community.
3. The members of the City Council Community Development & Neighborhood Revitalization Committee will serve as *ex officio* members of the Board.

### Public Hearings

1. The City will hold at least two public **in-person** hearings during the year to obtain citizens' views about housing and community development needs, development of proposed activities and review of program performance. **Virtual meeting may be allowed during the COVID-19 pandemic.** At least one public hearing will be held to obtain the views of citizens on housing and community development needs (including priority non-housing community development needs) before the Consolidated Plan is published for comment and before any application for Section 108 loan guarantee assistance is submitted. The City will also hold at least one public hearing during the update of the Assessment Fair Housing Plan.
2. The City will ensure adequate public notice before each **virtual or in-person** public hearing, with sufficient information published about the subject of the hearing to permit informed comment. Public hearings will be announced online and in the newspaper. Citizens will be notified of the public hearings two weeks before they are held. **Citizens must be notified of public hearings a minimum of four days during the COVID-19 pandemic.**
3. Advanced public notice will also be given of all public meetings relating to the Consolidated Plan and performance progress.
4. The City will hold all public hearings at times and locations convenient to potential and actual beneficiaries and accommodations will be made for people with disabilities. All hearings will be held in accessible locations, and sign language interpreters will be made available upon advance request **except when they are held online due to public safety measures in place during the COVID-19 pandemic.** Public hearings will be televised on the local public access channel.
5. The City will provide interpretation services for non-English speaking residents at public hearings upon advance request, provided such services are available in the community.

### Development of the Consolidated Plan

1. The City, through CEDO, will make a concerted effort to notify citizens, agencies and organizations of the development of the Consolidated Plan and the availability of CDBG funds through mailings, online postings and public notices in the newspaper. In addition, CEDO will notify the Steering Committees of the City's Neighborhood Planning Assemblies.
2. CEDO will conduct workshops at various and convenient times to inform and educate citizens on the development of the Consolidated Plan and the availability of funds. CEDO will provide technical assistance to all applicants, with special efforts to assist groups which represent predominately low and moderate income persons.

3. Before the City adopts the Consolidated Plan, the City will make available to citizens, public agencies and other interested parties information that includes the amount of assistance the City expects to be made available and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low and moderate income.
3. The City will publish its proposed Consolidated Plan for review and comment. The City will publish a newspaper summary describing the contents and purpose of the Consolidated Plan and listing the locations where the entire plan may be examined. The entire plan will be made available for review and examination at the Community & Economic Development Office, on its website as well as list the other public places it is available. The City will provide a reasonable number of free copies of the Plan to residents and groups that request it.
4. The City will receive and consider comments on the proposed Consolidated Plan for 30 days before preparing the final Consolidated Plan. A summary of any comments or views not accepted and the reasons why, shall be attached to the final Con Plan.

#### Development of Section 108 Loan Guarantee Assistance Applications

1. Before the City submits an application for Section 108 loan guarantee assistance, the City will make available to citizens, public agencies and other interested parties information that includes the amount of assistance the City expects to be made available (including program income), the range of activities that may be undertaken, the estimated amount that will benefit persons of low and moderate income, and any activities likely to result in displacement.
2. The City will publish its proposed application for review and comment. The City will publish a newspaper summary describing the contents and purpose of the application and listing the locations where the entire application may be examined. The entire application will be made available for review and examination at the Community & Economic Development Office and on its website.
3. The City will receive and consider comments on the proposed application for 30 days before preparing the final application.

#### Development of the Affirmatively Furthering Fair Housing (AFFH) Plan

1. Before the City submits an AFH Plan, the City will ensure meaningful community participation to include residents, other interested members of the public, populations who have historically experienced exclusion, including racial and ethnic minorities, residents of predominately low-and moderate-income neighborhoods, limited English proficient (LEP) persons, residents of public and assisted housing developments neighborhoods where CDBG funds are proposed to be used and persons with

disabilities. This will include members of the public in the jurisdictions of each collaborating program participant (Burlington and Winooski Housing Authorities) and not just of the City of Burlington as the lead entity.

2. The City will make any proposed analysis and the relevant documents, including the HUD-provided data and any other data to be included in the AFH, available to the public.
3. The City will consult with agencies and organizations identified in the consultation requirement.
4. The City will publish its proposed AFH Plan for review and comment. The City will publish a newspaper summary describing the contents and purpose of the Plan. The entire plan will be made available for review and examination at the Community & Economic Development Office and on its website, as well as list the other public places it is available. The City will provide a reasonable number of free copies of the Plan to residents and groups that request it.
5. The City will receive and consider comments on the proposed AFH Plan for 30 days before preparing the final AFH Plan. A summary of any comments or views not accepted and the reasons why, shall be attached to the final AFFH plan.
6. The City will provide for at least one public hearing during the development of the AFH and provide sufficient notice of this public hearing;

#### Amendments to the Consolidated Plan

1. The City will consider the following changes to be amendments to the Consolidated Plan, and the Annual Action Plan, and subject to the citizen participation process, in accordance with its Citizen Participation Plan. A substantial change is defined as one of the following occurrences:
  - A change that adds a new activity not previously mentioned in the Action Plan,
  - A change that cancels an activity that involves more than 10% or more of the fiscal year's funding allocation,
  - A change of the purpose, scope, location, or beneficiaries of an activity,
  - A change in the allocation priorities or change in method of distribution of funds.
2. Substantial amendments to the approved Consolidated Plan or Action Plan must be authorized by the Mayor and the Board of Finance, and will be made public by postings and public notices in the newspaper.
3. The City will receive and consider comments on substantial amendments to the Consolidated Plan or Action Plan for 30 days before implementing those amendments. During the COVID-19 pandemic, the City will receive and consider comments on substantial amendments to the Consolidated Plan or Action Plan for at least seven days before implementing those amendments.

### Amendments to the AFH Plan

1. The City will consider the following changes or revisions to be amendments to an accepted AFH Plan, and subject to the citizen participation process, in accordance with its Citizen Participation Plan. A material change is defined as when the information on which the AFH is based on, no longer reflect actual circumstances.
  - Presidentially declared disasters,
  - Significant demographic changes;
  - New significant contributing factors in the participant's jurisdiction;
  - Civil rights findings, determinations, settlements (including Voluntary Compliance Agreements), or court orders; or
  - HUD's written notification specifying a material change that requires the revision.
2. A revision may not necessarily require the submission of an entirely new AFH. The revision need only focus on the material change and appropriate adjustments to the analyses, assessments, priorities, or goals.
3. Where a revision is required for any reason other than a Presidentially declared disaster, the revision shall be submitted within 12 months of the onset of the material change, or at such later date as HUD may provide. Where the material change is the result of a Presidentially declared disaster, such time shall be automatically extended to the date that is 2 years after the date the disaster declaration is made, and HUD may extend such deadline, upon request, for good cause shown.
4. If HUD required the revision, HUD will specify a date by which the City must submit the revision of the AFH to HUD. Should the City not agree with the need to revise the AFH, the City must notify HUD with the reasons why the City believes a revision is not required within 30 calendar days. HUD will respond on or before 30 calendar days following the date of the receipt of the City's communication and will advise in writing whether HUD agrees or disagrees with the City. If HUD disagrees, the City must proceed with the revision. HUD may establish a new due date that is later than the date originally specified.
5. Material change amendments to an accepted AFH must be authorized by the Mayor and the Board of Finance, and will be made public by postings and public notices in the newspaper.
6. The City will receive and consider comments on material change amendments for 30 days before implementing those amendments. A summary of any comments or views not accepted and the reasons why, shall be attached to the final material change amendments to the AFH plan.

### Performance Reports

1. The City will prepare a performance report each year on the progress of the Consolidated Plan in accordance with the requirements of the U.S. Department of Housing & Urban Development.
2. Citizens will be afforded notice of the performance report through online postings and newspapers. The performance report will be available at CEDO, on its website for review as well as list the other public places it is available.
3. The City will receive and consider comments on the performance report for 15 days before the report is submitted to HUD.

#### Access to Information and Records

1. The City, through CEDO, will provide citizens, public agencies and other interested parties with reasonable and timely access to information and records relating to the City's Consolidated Plan and the City's use of funds under the CDBG and HOME programs during the preceding five years.
2. The City, through CEDO, will regularly communicate with citizens and applicants for CDBG funds regarding the progress of the Consolidated Plan. Neighborhood Planning Assembly representatives of the Citizen Advisory Board will be encouraged to communicate with the Neighborhood Planning Assemblies on the progress of the Advisory Board.

#### Comments and Complaints

1. The City will consider any comments or views of citizens received in writing or orally at public hearing, in preparing this Citizen Participation Plan, the final Consolidated Plan, substantial amendments to either Plan, the annual performance reports and the AFH Plan. A summary of these comments or views will be attached to the Citizen Participation Plan, the final Consolidated Plan, substantial amendment, performance report or AFH Plan.
2. The City, through CEDO, will respond to written complaints received by CEDO relating to the Consolidated Plan, any amendments to the Plan, the AFH and the annual performance reports. Upon request, CEDO will transcribe oral complaints for signature by the complaining person or organization. Where practicable, CEDO will respond to complaints within 15 working days of receiving the written complaint.

#### Displacement

The City will minimize displacement of persons (families, individuals, businesses, nonprofit organizations and farms) and will assist any persons displaced as a result of projects assisted with CDBG and/or HOME funds in accordance with the City of Burlington's Housing Initiatives Program Displacement Policy. That policy is available upon request from CEDO.